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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E.T.I. Euro Telecom International, N.V.,

Plaintiff,

v.

Republic of Bolivia and
Empresa Nacional de Telecomunicaciones
ENTEL S.A.,

Defendants.

CIVIL ACTION NO.
08-cv-4247 (LTS/FM)

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that Defendant the Republic of Bolivia ("Bolivia"), by and through its undersigned counsel, will move the Court, the Honorable Laura Taylor Swain, Presiding, at the United States Courthouse, 500 Pearl Street, New York, New York, on August 4, 2008, or on such other date as the Court may fix, pursuant to Rule 12(b)(1), (2), (5) and (6) of the Federal Rules of Civil Procedure and the Foreign Sovereign Immunities Act, 28 U.S.C. §1602 *et seq.*, for an Order dismissing, with prejudice, Plaintiff's Complaint for Attachment in Aid of International Arbitration and dissolving the *ex parte* order of prejudgment attachment issued herein on May 5, 2008 pursuant to said Complaint, together with an award of costs and attorneys fees and for such other and further relief as the Court deems appropriate.

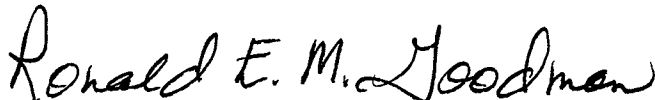
Pursuant to Local Rule 6.1(b) of the United District Court for the Southern District of New York, Plaintiff is required to serve and file any papers in opposition to Bolivia's Motion on or before July 25, 2008, with reply papers to be served and filed by Bolivia on or before August 1, 2008.

In support of its motion, Bolivia relies upon its accompanying Memorandum of Law; the Memorandum of Law in support of the Motion to Dismiss the Complaint filed contemporaneously herewith by Empresa Nacional de Telecomunicaciones ENTEL S.A. (Entel); and Bolivia's and Entel's respective previous submissions in this case.

Bolivia requests oral argument on its Motion.

As required by Rule 2B of the Individual Practice Rules of Judge Laura Swain Taylor, the undersigned counsel for the Republic Bolivia and counsel for Entel have used their best efforts to resolve informally the matters raised in Defendants' respective Motions to Dismiss the Complaint with counsel for Plaintiff, including exchanging e-mails and holding a telephone conference with counsel for Plaintiff.

Dated: Washington, D.C.
July 11, 2008


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